

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ESTERVINA PAULINO,

Plaintiff,

-against-

GLADYS CARRION, as Commissioner of the New York
State Office of Children and Family Services, and
THOMAS R. FRIEDEN, M.D., as Commissioner of the
New York City Department of Health and Mental Hygiene,

Defendants.

**DECLARATION OF
MARY O’SULLIVAN**

07-CV-5773 (LAK) GWG)

(ECF case)

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MARY O’SULLIVAN, hereby declares, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, as follows:

1. I am an attorney in the office of MICHAEL A. CARDOZO, Corporation Counsel of the City of New York and attorney for defendant THOMAS R. FRIEDEN, M.D., Commissioner of the New York City Department of Health and Mental Hygiene (“DOHMH,” the “City Defendant”), and I am fully familiar with the facts and circumstances surrounding this action.

2. I submit this declaration to place the relevant information and documents on the record in support of the City Defendant’s Motion for Judgment on the Pleadings, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure (“FRCP”) and motion for a stay of discovery, pursuant to Rule 26(c) of the FRCP, pending resolution by this Court of the motion for judgment on the pleadings.

2. Attached as Exhibit "A" is a copy of the Complaint in this action, which was filed with the Court on June 18, 2007.

3. Attached as Exhibit "B" is a copy of the City Defendant's Answer in this action, which was filed with the Court on August 17, 2007.

4. Attached as Exhibit "C" is a copy of the State Defendant's Answer in this action, which was filed with the Court on August 17, 2007.

3. Attached as Exhibit "D" is a copy of the Civil Docket Sheet in this action, as of January 3, 2008.

WHEREFORE, it is respectfully requested that this Court grant the City Defendant's motions, in their entirety.

Dated: New York, New York
January 7, 2008

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By: _____/s_____
Mary O'Sullivan (MO-8495)
Assistant Corporation Counsel